

Gregory W. Mitchell
FREEMAN LAW, PLLC
1412 Main Street, Suite 500
Dallas, Texas 75202
(972)463-8417 – Office
(972)432-7540 – Facsimile
State Bar ID: 00791285

ATTORNEY FOR DEBTOR GRCDALLASHOMES, LLC

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

In re: **GRCDALLAS HOMES, LLC**

§
§
§

Case No. 19-41186

Debtor

Chapter 11

MOTION TO WITHDRAW AS COUNSEL FOR DEBTOR

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS MOTION WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

1. Gregory Mitchell and Freeman Law, PLLC (“**Counsel**”) respectfully file this *Motion to Withdraw as Counsel* (“**Motion**”) requesting that they be allowed to withdraw as Counsel for Debtor in this matter.

2. Counsel and Debtor have irreconcilable differences with respect to the Debtor’s representation.

3. Debtor has not indicated whether it intends to seek replacement counsel.
4. There are two pending matters related to this case, as follows:
 - (1) The Debtor filed its *Debtor's Motion to Sell Property of the Estate Free and Clear of Liens, Claims, and Encumbrances Pursuant to 11 U.S.C. § 363(b) and Motion to Disburse* (the “**Motion to Sell**”) on April 22, 2022 (Dkt. #334). The Motion to Sell was filed on negative notice, and since no objection has yet been filed, no hearing is currently set.
 - (2) The United States Trustee filed its *United States Trustee's Motion to Convert or Dismiss with Prejudice Pursuant to 11 U.S.C. §1112(b) and §105 with Waiver of 30-day Hearing Requirement* (the “**UST Motion**”) on April 25, 2022 (Dkt. #338). A hearing on the UST Motion is set to occur on Tuesday, May 24, 2022, at 1:30 p.m.

DATED this 27th day of April, 2022.

Respectfully submitted,

FREEMAN LAW, PLLC

/s/ Gregory W. Mitchell

Gregory W. Mitchell

1412 Main Street, Suite 500

Dallas, Texas 75202

(972)463-8417 – Office

(972)432-7540 – Facsimile

State Bar ID: 00791285

E-mail: gmitchell@freemanlaw.com

ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on **April 27, 2022**, a true and correct copy of the foregoing was served on all parties receiving service via the court's ECF system.

FREEMAN LAW, PLLC

/s/ Gregory W. Mitchell

Gregory W. Mitchell

Attorney for Debtor